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July 13, 2016

Michael Busby  
40B Program Specialist  
MassHousing  
One Beacon Street, 26th floor  
Boston, MA 02108

Dear Mr. Busby:

Thank you for the opportunity to comment on the proposal by Fieldstone Estates LLC to develop 36 single family homes at 21 Wheeler Road in Grafton. While the Town supports the developer's goal to increase the Town's affordable housing supply, the plan as currently drawn falls short of achieving goals of the Town.

The Town has a long history of supporting affordable housing. The Town was an early adopter of G. L. c. 40R, creating the Fisherville Smart Growth District at the location of the former Fisherville Mill to encourage mixed use development, including up to 240 units of housing, 20% to 25% of which would be affordable. The Town has created an Affordable Housing Trust, which recently completed a priority plan for spending over \$1 million for increasing the supply of affordable housing in town. The Town has also worked closely with developers to create affordable housing in town, including roughly 96 units (24 affordable units) which, while approved, have not commenced construction. The Town also recently amended its Village Mixed Use District bylaw to require affordable units as part of any housing development eight units and greater. As you are aware, one of the findings that MassHousing is required to make pursuant to 760 CMR 56.04(4)(b), is that it has taken into consideration "municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under M.G.L. c.40A, and overlay districts adopted under M.G.L. c.40R[.]"

The Town has long sought to balance open space protection and development. The Town's 2001 Master Plan called for this balance specifically a goal to "encourage housing development patterns that preserve open space and natural features." The Town's 2007 Open Space and Recreation Plan expand upon the master plan by establishing goals to protect and conserve Grafton's Land Resources and Town Character. Lastly the 2013 Housing Production Plan stated that "the Town will continue to work with private developers to fine tune proposals to maximize their responsiveness to community interests and to increase affordability."

Elmrock Estates (formally known as Fieldstone Estates) is proposed as a 36 unit single family development on roughly 18 acres of land. The development will be accessed by a 1,550 foot road serving the development and contain two common driveways internal to the development. The project will be served by municipal water

and sewer. The Town requests the following comments be considered by MassHousing in the consideration of the site eligibility letter.

1. The "As of Right Plan" indicating that 18 units could be built on the property is not accurate as it necessitates significant waivers would be required by the Grafton Planning Board such as a waiver from the 500-foot maximum length of dead-end street and the separation of the access road from adjacent street. The Town is of the opinion that no more than 8 single family lots would be possible without the granting of significant waivers.
2. The Town is of the opinion that the plan as prepared does not provide adequate emergency access and circulation. The length of dead-end road is a concern for emergency responders and no provisions have been made for turnarounds except for the cu-de-sac at the end of the roadway. In addition, the plan does not indicate how properties will be serviced by the common driveways. Without this detail, emergency response department are not able to evaluate the design of the common driveways to evaluate adequacy for emergency vehicles.
3. The Plan relies on structured drainage and the development team should utilize low impact development techniques to minimize the size stormwater structures. Three detention basins are proposed adjacent to open space areas, potentially impacting trails and wildlife movement on these parcels.
4. The Town is concerned about the impacts additional traffic will have on the intersection of Wheeler Road and Worcester Street, which is constrained by available sight distance and a narrow bridge.

The Town believes that the project as designed is not consistent with the Town's Open Space and Recreation Plan. The property is identified within priority protection area to the west of Lake Ripple, known as the "Western Corridor." The "Western Corridor" is one of five open space corridors that the plan identified as largely contiguous areas of open space and encouraged protection of undeveloped parcels within these areas. The plan as drawn divides existing open space and presents an obstacle for wildlife.

The Town recognizes the property owner's right to develop land. The Town also recognizes and wholeheartedly supports the goal to increase the supply of affordable housing. However, the Town, though comments received by Staff, Board and Committee Members, and by residents, is of the opinion that the plan as prepared does not meet the needs of the town to balance housing development and the preservation of open space.

The Town recommends that MassHousing encourage the Applicant to consider a development scenario that clusters development closer to Wheeler Road. The Town believes that other development scenarios are possible that preserves the property owner's rights, allows for the creation of affordable housing, while minimizing impacts to existing open space and wildlife. Furthermore it will meet a goal of the Open Space and Recreation Plan to permanently protect parcels adjacent to contiguous open spaces.

Thank you again for consideration of these comments and those of Town Officials and residents included with this letter. There have been many public comments made on our development web form that you can review at <http://www.grafton-ma.gov/affordable-housing-trust/pages/elmrock-estates-fieldstone-farms-single-family-residential>. If you require hard copies, we can supply them at your request.

Regards,



Jennifer Thomas, Chairman  
Grafton Board of Selectmen